

William Stovall #AM3000
SCI - Phoenix
1200 Mokychic Drive
Collegeville, PA 19426

MARCH 17, 2021

HONORABLE BRIAN R. MARTINOTTI,
UNITED STATES DISTRICT JUDGE
CLARKSON S. FISHER BLDG, U.S. COURTHOUSE
402 EAST STATE STREETS
TRENTON, NEW JERSEY 08608

RE: Stovall v. Slaughter et al
3:20-cv-01709(BRM)
MOTION FOR AN EXTENSION OF TIME

HONORABLE JUDGE MARTINOTTI:

This Petitioner is proceeding pro se for a writ of habeas corpus pursuant to 28 U.S.C. par. 2254 (see ECF No. 1). On December 8, 2020 this court granted Petitioner's second motion for an extension of time to reply to Respondent's motion to dismiss. Further, on January 14, 2021 Petitioner filed an informal motion for appointment of pro bono counsel, or in the alternative, an extension of time (see ECF No. 28).

On March 2, 2021 I received this court's order & memorandum denying the appointment of pro bono counsel without prejudice, but did not address the request for the extension of time because the request was not properly submitted or submitted separately.

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AS REQUIRED (SEE ECF NO. 29) AND ATTACHMENT #A.

Please accept this letter in lieu of a formal motion requesting for the third time, an extension of time for a period of thirty days.

I respectfully ask that this motion be granted for the following reasons.

Due to the pandemic of Covid 19, the prison administration has arrested many of its previous institutional policy's enacted to govern the normal operation of its facility and now proceed on a random basis, thereby resulting in uncertainty, causing hardships by preventing petitioner from asserting his rights. For example, normally I would have access to the law library at least three times a week for a period of approximately three and one half hour (3½ hr.) per visit; but now the schedule has changed to about two visits per month and about one hour per visit if you are fortunate, and they don't cancel all law library passes arbitrarily, thus reducing your chances of visiting the law library more than once a month. Further, if you happen to make a minor mistake/error on your request slip they will return it to you unprocessed, (see attachment #2) because I forgot to place my prison ID number on the request slip it was returned.

Further, due to Covid 19 and the arbitrary fashion in which I've been placed in quarantine whenever I leave the prison and return, I lose the opportunity to access the law library. Normally, the required time period one must spend in quarantine was fourteen (14) days however that period has increased substantially from 21 days and in some cases prisoners have remained for forty five (45) days waiting for an open cell. On March 3, 2021 I was taken to the Einstein Hospital in Philadelphia for treatment and to have tests administered by the cardiologist. I was returned the same day and presently I have been interned in quarantine and don't

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KNOW WHEN I WILL BE RETURNED TO THE PRISONS GENERAL POPULATION.

FURTHER, ON A FEW PRIOR OCCASIONS I INFORMED THIS HONORABLE COURT THAT I WAS STRUGGLING TO PROCURE THE NECESSARY RELEVANT DOCUMENTS TO PROVE I WAS NOT DELINQUENT IN THIS TORTURED JOURNEY TO ASSERT MY RIGHTS AND PRESENT MY PETITION FOR HABEAS CORPUS RELIEF. LAST MONTH MY SON SHIPPED THOSE DOCUMENTS IN QUESTION TO ME, HOWEVER THEY WERE RETURNED AS UNDELIVERABLE BECAUSE THE INSTITUTIONS WOULD NOT ACCEPT IT. CONTRARY TO ESTABLISHED INSTITUTIONAL POLICY THE PRISON NEVER NOTIFY ME OF THEIR ARRIVAL IN ORDER TO AFFORD ME THE OPPORTUNITY TO APPEAL THEIR DECISION TO REJECT THE MAIL. PRESENT I AM TRYING TO LOCATE AN ATTORNEY WHO WOULD COPY THE DOCUMENTS AND MAIL THEM TO ME.

LASTLY, IN ADDITION TO THE ABOVEMENTIONED REASONS, PLEASE NOTE THAT THIS PETITIONER IS ALSO IN THE PROCESS OF PREPARING AN APPEAL FOR A MATTER IN STATE COURT. THEREFORE, THIS PETITIONER IMPLORE THIS HONORABLE COURT TO GRANT HIM A THIRTY (30) DAY EXTENSION OF TIME SO THAT HE CAN REPLY TO RESPONDENTS MOTION TO DISMISS HIS HABEAS CORPUS PETITION FOR BEING TIME BARRED.

RESPECTFULLY SUBMITTED
William Stovall

ENCLOSURES -2

CC: FILED

CLERK, U.S. DISTRICT COURT
402 E. STATE STREET, ROOM 2020
TRENTON, NEW JERSEY 08608

OFFICIAL BUSINESS

Case 3:20-cv-01709-BRM Document 40 Filed 05/07/21 Page 4 of 6 PageID: 1503

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WILLIAM STOVALL #210197A/66145

210197A/66145

SCI-PHOENIX
#AM3000
1200 MOKYCHIC DRIVE
COLLEGEVILLE, PA 19426

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19426-363620



ATTACHMENT #A

JAN. 27 2021

Form DC-135A		Commonwealth of Pennsylvania Department of Corrections
INMATE'S REQUEST TO STAFF MEMBER		
<p>To: (Name and Title of Officer) <u>AS. PLAT = LAW LIBRARIAN</u></p> <p>By: (Print Inmate Name and Number) <u>William Stovall</u> <u>William Stovall</u> Inmate Signature</p>		INSTRUCTIONS Complete items number 1-8. If you follow instructions in preparing your request, it can be responded to more promptly and intelligently.
1. To: (Name and Title of Officer) <u>AS. PLAT = LAW LIBRARIAN</u>		2. Date: <u>1-24-21</u>
3. By: (Print Inmate Name and Number) <u>William Stovall</u>		4. Counselor's Name: <u>Ms Watson</u>
		5. Unit Manager's Name: <u>STRENTKOWSKI</u>
6. Work Assignment: <u>None</u>		7. Housing Assignment: <u>H-A-1012-C</u>
8. Subject: State your request completely but briefly. Give details. <p>I have a filing date with the Federal Courts which is mandatory. There's a good possibility that I may become time barred because I've been denied access to the law library to do typing of motions, briefs and the necessary research. I was last approved to attend on January 15, 21 but that appointment was concealed and that request was placed on the 11th of January 2021 - Please schedule me as soon as you can.</p>		
9. Response: (This Section for Staff Response Only)		
<input type="checkbox"/> To DC-14 CAR only		<input type="checkbox"/> To DC-14 CAR and DC-15 IRS
STAFF MEMBER NAME <u>L Shan</u> Print		Signature  DATE <u>01/27/21</u>

William Stovall #AM3010
SCI-Phoenix
Legal Mail
1200 Mokychic Drive
Collegeville, PA 19426



The HONORABLE BRIAN R. MARTINOTTI
UNITED STATES DISTRICT JUDGE
CLARKSON S. FISHER BLDG., U.S. COURTHOUSE
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TRENTON, NEW JERSEY 08608

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[REDACTED]
"Inmate Mail - PA DEPT. OF CORRECTIONS"